

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ON SEMICONDUCTOR CORP. and )  
SEMICONDUCTOR COMPONENTS )  
INDUSTRIES, L.L.C., )

Plaintiffs, )

v. )

SAMSUNG ELECTRONICS CO., LTD., )  
SAMSUNG ELECTRONICS AMERICA, INC., )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA GENERAL, L.L.C., )  
SAMSUNG SEMICONDUCTOR, INC., and )  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C., )

Defendants. )

C.A. No. 07-449 (JJF)

SAMSUNG ELECTRONICS CO., LTD., )  
SAMSUNG ELECTRONICS AMERICA, INC., )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA GENERAL, L.L.C., )  
SAMSUNG SEMICONDUCTOR, INC., and )  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C., )

Plaintiffs, )

v. )

ON SEMICONDUCTOR CORP. and )  
SEMICONDUCTOR COMPONENTS )  
INDUSTRIES, L.L.C., )

Defendants. )

C.A. No. 06-720 (JJF)

**ON SEMICONDUCTOR'S MOTION TO COMPEL DAMAGES DISCOVERY**

ON Semiconductor Corp. and Semiconductor Components Industries, L.L.C.  
(collectively, "ON Semiconductor") hereby move to compel Samsung Electronics Co., Ltd.,  
Samsung Electronics America, Inc., Samsung Telecommunications America General, L.L.C.,

Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, L.L.C. (collectively, “Samsung”) to produce the following documents and information:

- 1) A complete set of Samsung’s license agreements and documents concerning license negotiations relating to the patented subject matter and infringing products, and comparable technology and products, including royalties paid and collected, and licensing policies;
- 2) Financial information sufficient to show all sales of infringing products, including direct sales by Samsung of the products alone and as incorporated into covered products, and sales by Samsung to third parties both in and outside of the United States; and
- 3) Business and marketing information, including information sufficient to show the corporate structure of Samsung and its related companies, and Samsung’s business and strategic plans and marketing information concerning the infringing products.

The grounds for this motion are set forth in ON Semiconductor’s opening brief, filed herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Richard J. Bauer

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August 15, 2008

**RULE 7.1.1. CERTIFICATE**

Pursuant to D. Del. L.R. 7.1.1, this is to certify that counsel for ON Semiconductor has discussed the subject matter of this motion with counsel for Samsung and has not been able to reach agreement on the matters therein.

/s/ Richard J. Bauer

Richard J. Bauer (#4828)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on August 15, 2008 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Josy W. Ingersoll  
John W. Shaw  
Andrew A. Lundgren  
YOUNG CONAWAY STARGATT & TAYLOR

I also certify that copies were caused to be served on August 15, 2008 upon the following in the manner indicated:

**BY HAND AND E-MAIL**

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/s/ Richard J. Bauer

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